

**HIGHER EDUCATION LOAN AUTHORITY  
OF THE STATE OF MISSOURI**

**Plaintiff,**

v.

**THE UNITED STATES OF AMERICA,**

**Defendant.**

No. 18-1758 C

In accordance with Rule 40.2 of the Rules of the U.S. Court of Federal Claims, Plaintiff, Higher Education Loan Authority of the State of Missouri (“MOHELA”), hereby provides this Notice of Directly Related Cases.

MOHELA's bid protest in this Court involves the same two-phase procurement that has been protested by Navient. Further, although the Navient protest was filed under seal and MOHELA only possesses the redacted version of Navient's complaint, both plaintiffs have claimed that the Agency improperly expanded "Component D" of the procurement in Phase II. Thus, although certain legal and factual issues raised by MOHELA and Navient may differ, the

assignment of the MOHELA protest to Judge Wheeler would be beneficial for the expedient resolution of the MOHELA protest and for the sake of consistency in the outcome.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Scott F. Lane", is written over a horizontal line.

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Attorney of Record for Plaintiff  
Higher Education Loan Authority of the State of Missouri

Of Counsel:

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Dated: November 14, 2018

**CERTIFICATE OF SERVICE**

I hereby certify that on November 14, 2018, I caused copies of the Plaintiff's Notice of Related Cases to be served by electronic mail upon:

John J. Todor, Esq.  
U.S. Department of Justice  
Commercial Litigation Branch  
P.O. Box 480  
Ben Franklin Station  
Washington, D.C. 20044  
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Pursuant to RCFC 40.2(a)(3)(C), the foregoing was also served on the same day by electronic mail upon all parties in the related case as follows:

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Scott F. Lane